

# Ren Rong Pan Attorney At Law

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Via ECF/E- Mail

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April 24, 2025

Hon. Jessica S. Allen  
District Court of New Jersey  
Newark, NJ

Re: **Joint Status Report Letter**

**JINHUA HIBO TECHNOLOGY CO.,LTD., v. USMARTPLUS INC.**

**Case Number: 2:24-cv-08257-CCC-JSA**

Dear Hon. Allen:

I represent Defendant in the captioned civil action. Per Your Honor's Order dated April 1, 2025, I wish to respond to Plaintiff counsel's letter dated April 23, 2024, upon information and belief, as follows:

1. Defendant did serve the Deposition Notices upon the Plaintiff Counsel on 04/16/2024 with a request for a proposed Joint Discovery Plan – once “she has done her part.”
2. I did not receive any response until today – April 24, 2024 – apparently Plaintiff's “new counsel” named Adam Wiener emailed the response with Plaintiff's Deposition Notice. That's the reason why I never received any previous emails or telephone calls from the Plaintiff's Counsel. The same counsel filed “Plaintiff's Status Report” just a few hours later on the same day. I did submit the Joint Status Report earlier today.
3. The Parties did exchange their responses to Requests for Production of Documents except that, to date, I have yet to receive copies of the documents or provided with reasonable access to such documents allegedly containing 375 pages. Once I receive the said documents, I will gladly withdraw my characterization of “bare bones.”
4. Furthermore, Parties did engage in settlement negotiations albeit Plaintiffs never compromise from the position of getting full claim of \$800,000.00 while Defendant has offered \$100,000.00 – continuing from where they last left off back in February last year. As we view it, the ball is in the plaintiffs' court.

Thank you for your Honor's anticipated courtesies in this matter.

Sincerely yours,

S/ Ren Rong Pan

Ren Rong Pan, Attorney at Law

RRP:ck

c. c. Adam Wiener and Jessica Chen  
Counsel for Plaintiff (Via CMECF)